# GLOBAL FORCE ENTMT., INC., ET AL. vs ANTHEM SPORTS & ENTMT. CORP., ET AL. 30(b)(6) Jeffrey Jarrett on 11/19/2019

	·
1	IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE
2	AT NASHVILLE
3	GLOBAL FORCE ENTERTAINMENT,
4	INC. and JEFFREY JARRETT,
5	Plaintiffs, CASE NO. 3:18-cv-00749 CHIEF JUDGE WAVERLY D.
6	vs. CRENSHAW, JR. MAGISTRATE JUDGE
7	ANTHEM SPORTS & ENTERTAINMENT JOE B. BROWN CORP., and ANTHEM WRESTLING EXHIBITIONS, LLC,
9	Defendants.
10	
11	
12	
13	Deposition of:
14	JEFFREY JARRETT 30(b)(6) GLOBAL FORCE ENTERTAINMENT, INC.
15	Taken on behalf of the Defendants
16	November 19, 2019
17	
18	
19	
20	
21	
22	
23	Huseby Nashville Deborah Harris Honeycutt, LCR
24	214 2nd Avenue North, Suite 207 Nashville, Tennessee 37201
25	(615)256-1935

www.huseby.com Huseby, Inc. Regional Centers 800-333-2082
Charlotte ~ Atlanta ~ Washington, DC ~ New York ~ Houston ~ San Francisco
Case 3:18-cv-00749 Document 165-1 Filed 06/12/20 Page 1 of 6 PageID #: 2405

- 1 as a four-part series you were employed by Anthem
- 2 Wrestling?
- 3 MR. MILLER: Objection to form.
- 4 THE WITNESS: Yes.
- 5 BY MR. LEE:
- 6 Q. Going back to paragraph 112. At the end it
- 7 says: Likely to cause confusion. Are you aware of
- 8 any actual confusion by any customers with respect
- 9 to what the alleged Anthem improper use of the
- 10 Global Force Wrestling or GFW marks?
- 11 A. Can you clarify the question? I want to make
- 12 sure. Am I aware --
- 13 Q. Are you aware of any actual confusion by
- 14 consumers or customers of Anthem Wrestling's
- 15 allegedly improper use of the Global Force Wrestling
- 16 or GFW marks?
- 17 A. Yes.
- 18 O. Tell me, what is it?
- 19 A. From the time that we split through generally
- 20 most of 2018, the wrestling fans continued to ask
- 21 questions in general like are you a part of Impact?
- 22 Did you leave Global Force and Impact? Does Impact
- 23 own GFW? Does GFW own Impact? Just general
- 24 confusion in the marketplace on where things stood.
- 25 O. Similar to kind of that newspaper article we

www.huseby.com Huseby, Inc. Regional Centers 800-333-2082
Charlotte ~ Atlanta ~ Washington, DC New York ~ Houston ~ San Francisco
Case 3:18-cv-00749 Document 165-1 Filed 06/12/20 Page 2 of 6 PageID #: 2406

- 1 looked at earlier from June of 2017, where even in
- 2 that article there was the Tennessean article where
- 3 he's talking about GFW where, again, it's not --
- 4 even the author of that article wasn't necessarily
- 5 accurately kind of stating things there? It's that
- 6 type of confusion? It's similar to that type of
- 7 confusion?
- 8 MR. MILLER: Objection to form.
- 9 THE WITNESS: I don't -- I -- I would --
- 10 I would not classify them exclusively in the same
- 11 category.
- 12 BY MR. LEE:
- 13 Q. Okay. So after the split through 2018, when
- 14 the wrestling fans would have this type of
- 15 confusion, how was that conveyed to you? Who was
- 16 that conveyed to, to you individually or to Global
- 17 Force Entertainment?
- 18 A. Both.
- 19 O. How did they convey that confusion to you?
- 20 A. To me personally, at events, conventions,
- 21 wrestling shows, wrestling events. And then on --
- 22 through social media.
- 23 Q. Do you have -- so what social media accounts
- 24 does Global Force Entertainment have?
- 25 A. Instagram, YouTube, Twitter, Facebook.

www.huseby.com Huseby, Inc. Regional Centers 800-333-2082
Charlotte ~ Atlanta ~ Washington, DC ~ New York ~ Houston ~ San Francisco
Case 3:18-cv-00749 Document 165-1 Filed 06/12/20 Page 3 of 6 PageID #: 2407

- 1 times. The Tag Team Title. The European Title.
- 2 That's it.
- 3 Q. Did you wrestle at WrestleMania during your
- 4 time with WWE?
- 5 A. Yes.
- 6 Q. Did you wrestle at WrestleMania XI?
- 7 A. Yes.
- 8 O. And that would be --
- 9 A. XI.
- 10 Q. -- XI, yeah. Wrestled at WrestleMania XI
- 11 against Razor Ramon?
- 12 A. Yes.
- 13 Q. Razor Ramon. And did you wrestle in
- 14 WrestleMania XV?
- 15 A. XIII.
- 16 O. XIII. You didn't wrestle in XI or XV as
- 17 well?
- 18 A. You're going to get me confused.
- 19 Q. How many WrestleManias do you recall
- 20 wrestling at?
- 21 A. X, XI. In Hartford. Philly. I'm trying to
- 22 think of the other ones. Several.
- 23 Q. So several. Were those WrestleManias
- 24 broadcast?
- 25 A. Yes.

www.huseby.com Huseby, Inc. Regional Centers 800-333-2082
Charlotte ~ Atlanta ~ Washington, DC ~ New York ~ Houston ~ San Francisco
Case 3:18-cv-00749 Document 165-1 Filed 06/12/20 Page 4 of 6 PageID #: 2408

- 1 Q. Were they recorded and now sold on DVD
- 2 format?
- 3 A. Yes.
- 4 Q. Do they continue to be hold by the WWE on DVD
- 5 format?
- 6 A. Yes.
- 7 Q. During your time with the WWF, which is now
- 8 the WWE, did you appear on numerous pay-per-view
- 9 events and televised wrestling matches?
- 10 A. Yes.
- 11 Q. Were many of those recorded by the WWE?
- 12 A. All of them.
- 13 Q. Are any -- to your knowledge are any of them
- 14 still available for streaming on WWE service or
- 15 through purchasing from the WWE?
- 16 A. Yes.
- 17 Q. Who, if anyone, is Bob Holly?
- 18 A. Real name Bob Howard from Southern Alabama.
- 19 I started working with Bob in the late '80s. His
- 20 professional name/persona became Sparky, Spark Plug
- 21 Bob Holly, and then later just Bob Holly.
- 22 O. Did you wrestle Bob Holly for the
- 23 Intercontinental Title in April of 1995?
- 24 A. Yes.
- 25 O. Who, if anyone, is Cactus Jack?

www.huseby.com Huseby, Inc. Regional Centers 800-333-2082
Charlotte ~ Atlanta ~ Washington, DC ~ New York ~ Houston ~ San Francisco
Case 3:18-cv-00749 Document 165-1 Filed 06/12/20 Page 5 of 6 PageID #: 2409

1	REPORTER'S CERTIFICATE
2	
3	I, Deborah Harris Honeycutt, LCR, Notary
4	Public and Court Reporter, do hereby certify that I
5	recorded to the best of my skill and ability by
6	machine shorthand all the proceedings in the
7	foregoing transcript, and that said transcript is a
8	true, accurate, and complete transcript to the best
9	of my ability.
10	I further certify that I am not an
11	attorney or counsel of any of the parties, nor a
12	relative or employee of any attorney or counsel
13	connected with the action, nor financially
14	interested in the action.
15	SIGNED this 2nd day of December, 2019.
16	Delegand Odl
17	Responsh gottarnis
18	
19	Deborah Harris Honeycutt, LCR
20	
21	My Notary commission expires: 5/05/2020
22	Tennessee LCR No. 472 Expires: 6/30/2020
23	
24	
25	